

ORIGINAL

BEFORE THE

**Federal Communications Commission RECEIVED**

WASHINGTON, D.C. 20554

MAY - 1 1992

In the Matter of

Amendment of Parts 2, 90 of the  
Commission's Rules To Permit  
Increased Use of Frequencies In The  
156-162 MHz Bands By Industrial  
and Land Transportation Private  
Land Mobile Radio Services

RM-7956

Federal Communications Commission  
Office of the Secretary

To the Commission:

**COMMENTS OF THE  
FOREST INDUSTRIES TELECOMMUNICATIONS**

Forest Industries Telecommunications ("FIT") respectfully submits its comments on the above-referenced petition for rule making filed by the Council of Independent Communication Suppliers ("CICS"), which identifies itself as a "distinct market council of the Special Industrial Radio Service Association" ("SIRSA"). See, Petition, footnote 1.

CICS/SIRSA asks the Commission to split certain of the 25 KHz channels in the 156-162 MHz band now allocated in the maritime mobile service for public correspondence and for port operations, and to allocate the resulting new 12.5 MHz (split) frequencies to an industrial/land transportation "pool" to be "managed" by SIRSA. The petitioner also proposes mileage separation between maritime coast stations and land mobile base stations on adjacent frequencies as well as power limitations on land mobile stations on the new 12.5 KHz frequencies in order to prevent adjacent channel interference. For the reasons discussed below, FIT is constrained to recommend that the Commission deny the petition.

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FIT is the national organization of radio users licensed in the Forest Products Radio Service. For more than 40 years, FIT has been recognized by the Commission as the frequency coordinator for the Forest Products Radio Service, one of the Industrial Radio Services. It is the industry's spokesman on matters pertaining to radio communications in the forest products industry.

The forest products industry needs additional frequencies in the VHF bands very badly. The mobile communications requirements of the industry can be accommodated adequately only on VHF frequencies. Nevertheless, FIT believes that grant of the CICS/SIRSA petition would not be in the public interest, for several reasons. First, it is at best unclear how useful the proposed new splits would be to the forest products and to other industries in view of the proposed mandatory 50-mile separation between public coast and land mobile stations on adjacent frequencies. Also, it is unlikely that equipment would be produced and made available at reasonable prices for 12.5 KHz operation in the 156-162 MHz bands since it would appear that the market for equipment to operate on the proposed new frequencies would be extremely limited. And, importantly, judging from recent history, allocation of the proposed new frequencies in a single pool would bring about another "gold rush", so that whatever useful frequencies may become available would end up most likely in the hands of speculators. The forest products industry wants no part of still another lottery or of midnight applications filing lines in front of SIRSA's offices.

While the potential benefits of the proposal are questionable, the disadvantages of going forward with it would be real and substantial. First, handling the proposed rule making (which more than likely would be controversial) would divert scarce Private Radio Bureau staff resources from other more promising projects, such as the "re-farming" of the private land mobile frequencies in the bands below 470 MHz. It is far more important to proceed with rule making looking towards implementing truly narrowband and other spectrum efficient technologies in the 30-50, 150-170, and 450-512 MHz along the lines recommended by FIT and others than to squander resources pursuing CICS/SIRSA's petition. Moreover, grant of CICS/SIRSA's proposal would create the illusion that meaningful relief may be forthcoming to those needing VHF frequencies and could lend support, superficial as it may be, to the position of those, such as SIRSA and CICS, who have recommended against implementing truly narrowband technology in the 150-170 band any time soon. See, e.g., Joint Comments of SIRSA, et al, in PR Docket 91-170.

FIT wants to emphasize that neither CICS nor SIRSA represents the views of the forest products industry on land mobile communications issues nor are they necessarily aware of the industry's mobile communications requirements. Thus, any implied representation in their petition that they may be speaking for the licensees in the Forest Products Radio Service or of all other Industrial Radio Services would be presumptuous, self-serving and should be disregarded.

Accordingly, the Commission is urged to deny the above-referenced petition.

Respectfully submitted,

FOREST INDUSTRIES TELECOMMUNICATIONS

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Date: May 1, 1992

CERTIFICATE OF SERVICE

I, Chellestine Johnson, a secretary in the law firm of Fletcher, Heald & Hildreth, do hereby certify that copies of the foregoing "Comments of the Forest Industries Telecommunications" were sent this 1st day of May, 1992, by first-class United States mail, postage prepaid, to:

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